

SHER TREMONTE LLP

February 5, 2025

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The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Joadin Espinal Rodriguez
Case No. 23 Cr. 494 (VEC)

Dear Judge Caproni:

We represent Joadin Espinal Rodriguez, a defendant in the above-referenced action. We write to inform the Court that Mr. Espinal Rodriguez and the government have reached an agreement in principle as to a pretrial disposition of this action. As the parties are in the process of finalizing a plea agreement, the defense requests that the February 7, 2025 deadlines for pretrial motions and expert disclosures be adjourned to February 21, 2025. We have conferred with the government which takes no position on this request.

Respectfully submitted,

/s/ Noam Biale

Noam Biale
Courtney Gans

cc: All counsel (by ECF)

Application GRANTED. The parties' deadline to make expert disclosures is ADJOURNED from Friday, February 7, 2025, to **Friday, February 21, 2025**.

The parties' deadline to file pretrial motions is also ADJOURNED from Friday, February 7, 2025, to **Friday, February 21, 2025**. The deadline for responses to any pretrial motions is ADJOURNED from Friday, February 28, 2025, to **Friday, March 14, 2025**. The deadline for reply papers, if any, is ADJOURNED from Friday, March 7, 2025, to **Friday, March 21, 2025**.

IT IS FURTHER ORDERED that time is excluded for the period between February 5, 2025, and February 21, 2025, under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), as the ends of justice are served by allowing time for Defendant to negotiate a plea agreement.

SO ORDERED.



2/5/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE